

ENTERED

January 24, 2024

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY
COURT FOR THE SOUTHERN DISTRICT OF
TEXAS HOUSTON DIVISION**

In re: Fieldwood Energy III LLC, et al., Post-Effective Date Debtors¹.	§ § § § § §	Case No. 20-33948 (MI) Chapter 11 Jointly Administered
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**AMENDED STIPULATION EXTENDING RESPONSE DATE AND
RESETTING HEARING DATE ON PLAN ADMINISTRATOR'S OBJECTION TO
PROOFS OF CLAIM FILED BY TALOS ENERGY OFFSHORE LLC,
TALOS ENERGY LLC, TALOS ENERGY INC., AND TALOS PRODUCTION INC.**

[Relates to Dkt. No. 2835]

This amended stipulation and agreement (the “**Stipulation**”) is entered into by and among (i) David Dunn, the plan administrator (the “**Plan Administrator**”) appointed pursuant to the Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Docket No. 2016])²; and Talos Energy Offshore, LLC, Talos Energy LLC, Talos Energy Inc., and Talos Production Inc. (collectively, “**Talos**”) regarding the Plan Administrator’s Objection to Proofs of Claim of Talos Energy Offshore, LLC, Talos Energy LLC, Talos Energy Inc., and Talos Production Inc. [Docket No. 2835] (the “**Objection**”). The Parties hereby stipulate and agree as follows:

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

WHEREAS, on or about November 25, 2020, Talos timely filed Proofs of Claim Numbers 724, 780 and 786 (collectively, the “**Talos Initial Claims**”).

WHEREAS, on or about March 25, 2022, Talos timely filed Proofs of Claim Numbers 1083, 1085 and 1088 asserting administrative expense claims (collectively, the “**Talos Administrative Claims**”).

WHEREAS, the Plan Administrator filed his Objection on August 15, 2023, which included a deadline of September 14, 2023 for Talos to respond to the Objection (the “**Response Date**”) and an initial pre-trial hearing on the Objection set for October 2, 2023 at 10:30 a.m. CT (the “**Pre-Trial Hearing**”).

WHEREAS, on September 12, 2023, the Parties agreed to extend Talos’ Response Date to October 13, 2023 and to reset the Pre-Trial Hearing to November 6, 2023 at 10:00 a.m.

WHEREAS, on October 13, 2023, the Parties agreed to further extend Talos’ Response Date to November 13, 2023 and reset the Pre-Trial Hearing to January 24, 2024 at 9:00 a.m.

WHEREAS, on November 10, 2023, the Parties agreed to further extend Talos’ Response Date to December 15, 2023.

WHEREAS, on December 13, 2023, the Parties agreed to further extend Talos’ Response Date to January 10, 2024.

WHEREAS, on January 9, 2024, the Parties agreed to further extend Talos’ Response Date to January 20, 2024.

WHEREAS, on January 19, 2024, the Parties submitted a stipulation and agreed order to further extend Talos’ Response Date to March 7, 2024 and to continue the initial pre-trial hearing on the Objection set for January 24, 2024 at 9:00 am but mistakenly did not include a continued hearing date.

WHEREAS, the Parties have agreed to enter into and jointly submit this Stipulation further extending the Response Date in connection with the Objection.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. The Response Date is extended to and through March 7, 2024, subject to further extensions based on the Parties' agreement.
2. The initial pre-trial hearing on the Objection is reset to March 21, 2024 at 1:30 p.m.

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first written below.

Signed: January 24, 2024

A handwritten signature in black ink, appearing to read 'M Isgur', is written over a horizontal line.

Marvin Isgur
United States Bankruptcy Judge

Dated: January 23, 2024

**BOND ELLIS EPPICH SCHAFFER JONES PORTER HEDGES LLP
LLP**

By: /s/ Aaron Guerrero

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**ATTORNEYS FOR TALOS ENERGY
OFFSHORE LLC, TALOS ENERGY
LLC, TALOS ENERGY INC., AND
TALOS PRODUCTION INC.**

Certificate of Service

I hereby certify that on the 23rd day of January, 2024 a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Aaron Guerrero

Aaron Guerrero